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Nevada Bar No. 322
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Attorney for General Motors LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIE ANTIONETTE GUZMAN, as,
Administrator of the Wrongful Death
Estates of RAYMOND GUZMAN and
MARY GUZMAN,

Plaintiff,

vs.

THE PEP BOYS MANNY MOE & JACK,
Pennsylvania corporation; COOPER TIRE
& RUBBER COMPANY, a Delaware corporation;
GENERAL MOTORS COMPANY, LLC., a Delaware
corporation; ROE COMPONENT PART
MANUFACTURER; ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO. _____

GENERAL MOTORS LLC'S NOTICE
OF REMOVAL

General Motors LLC ("GM LLC"), incorrectly identified as "General Motors Company, LLC," pursuant to 28 U.S.C. §§ 1332, 1441, removes this action from the District Court, Clark County, Nevada, to the United States District Court for the District of Nevada, and states the following in support:

1. On January 27, 2017, the plaintiff filed this civil action, styled *Marie Antoinette Guzman, as Administrator of the Wrongful Death Estates of Raymond Guzman and Mary Guzman v. The Pep*

1 *Boys Manny Moe & Jack, et al*, Case No. A-17-750192-C, in the District Court, Clark County, Nevada.
2 *See* Compl. GM LLC's agent was served on February 2, 2017. *See* Notice of Service of Process, dated
3 February 3, 2017. As required by 28 U.S.C. § 1446(a), the plaintiff's Complaint is attached to this
4 Notice of Removal as Exhibit A, and all other process, pleadings, and orders served upon GM LLC are
5 attached as Exhibit B.

6 2. This is a products liability action arising out of the deaths of two adults, Raymond and
7 Mary Guzman, in a single vehicle rollover crash that occurred after a tire allegedly became disabled.
8 Compl. ¶¶ 8-12. The plaintiff sues for the alleged wrongful death of plaintiff's decedents and for
9 punitive damages. *Id.* ¶¶ 50-53.

10 3. The plaintiff is and was at all relevant times a citizen of the State of California, where
11 she qualified as the administrator of the decedents' estates and where the decedents lived until their
12 deaths. Compl., ¶ 1.

13 4. GM LLC is a Delaware corporation with its principal place of business in Detroit,
14 Michigan. Compl., ¶ 5.

15 5. The Pep Boys-Manny, Moe and Jack is a Pennsylvania corporation with its principal
16 place of business in Pennsylvania. It is not a citizen of either California or Nevada for purposes of
17 diversity.

18 6. Cooper Tire & Rubber Company is a Delaware corporation with its principal place of
19 business in Ohio. It is not a citizen of either California or Nevada for purposes of diversity.

20 7. "Roe Component Part Manufacturer" is not a corporation or other legal entity. It is a
21 fictitious name used by the plaintiff to describe an unknown company. Compl. ¶ 6.

22 8. The plaintiff and the known defendants are citizens of different states and the defendants
23 are not citizens of Nevada. The citizenship of "Roe" "shall be disregarded" for purposes of the diversity
24 analysis. 28 U.S.C. 1441(b)(1).

25 9. Consistent with Rule 8 of the Nevada Rules of Civil Procedure, the Complaint does not
26 state a monetary demand; rather it states that the demand is in an amount "in excess of" the jurisdictional
27 requirements.
28

10. Absent a specific prayer for relief in the Complaint, removal is proper if the removing-defendant shows by a preponderance of the evidence that the monetary value of the relief sought exceeds \$75,000, exclusive of interest and costs. 28 U.S.C. §§ 1332(a), 1446(c)(2)(B), *see also*, *Sanchez v. Monumental Life Ins. Co.*, 102 F.3d 398 (9th Cir. 1996); *Guglielmino v. McKee Foods Corp.*, 506 F.3d 696, 700 (9th Cir. 2007). The “amount in controversy is measured by the value of the object of the litigation.” *Hunt v. Washington State Apple Adver. Comm’n*, 432 U.S. 333, 347 (1977). When punitive damages are available to a plaintiff, the court must aggregate punitive and compensatory damages to determine the amount in controversy. *Bell v. Preferred Life Assurance Assoc.*, 320 U.S. 238, 240 (1943).

11. In cases such as this, “where the complaint alleges only . . . lower limits or types of damages, a district court is free in its preponderance-of-the-evidence analysis to make estimations of the amount of damages that could be obtained consistent with the vague wording of the complaint.” *Henderson v. Wal-Mart Stores, Inc.*, No. 2:15-cv-01453-JAD-GWF, 2015 U.S. Dist. LEXIS 152820, at *3 (D. Nev. Nov. 9, 2015). Further, courts can make “reasonable deductions, reasonable inferences, or other reasonable extrapolations from the pleadings to determine whether it is facially apparent that a case is removable,” and “may use their judicial experience and common sense in determining whether the case stated in a complaint meets federal jurisdictional requirements.” *Henderson*, 2015 U.S. Dist. LEXIS 152820, at *3 (citing *Roe v. Michelin N. Am., Inc.*, 613 F.3d 1058, 1061-62 (11th Cir. 2010)).

12. In this case, the plaintiff seeks to recover for the alleged wrongful deaths of Raymond and Mary Guzman who were killed in the crash. Compl. ¶ 49. The plaintiff seeks damages for:

- a. the alleged “disfigurement and extreme pain and suffering” of Raymond and Mary Guzman in an amount exceeding \$15,000 (Compl. ¶ 50);
- b. her own and the Guzman’s heirs’ “grief, sorrow, losses of companionship, society and comfort” in an amount exceeding \$15,000 (Compl. ¶ 51);
- c. general damages in an amount exceeding \$15,000 (Compl. ¶ 52);

d. “punitive damages as proscribed by statute” in an amount exceeding \$15,000¹ (Compl. ¶ 53);

e. “reasonable attorney’s fees” (Prayer for Relief, ¶ 6).

13. Thus, the plaintiff expressly alleges that the amount in controversy exceeds at least \$60,000. The real amount in controversy, however, will certainly exceed \$75,000 based on the fact that this is a claim for the wrongful deaths and pre-death pain and suffering of two individuals. Compl. ¶ 50.

14. Courts, in similar circumstances, have held that wrongful death allegations alone are enough to establish that the amount in controversy requirement is met. *See, e.g., Robinson v. Automa, SPA*, No. 13-cv-02305, 2014 U.S. Dist. LEXIS 62382, at *2 (D. Nev. May 5, 2014) (collecting other cases saying the same).

15. The nature of this wrongful death action and personal injury claim makes it apparent that the amount in controversy exceeds \$75,000, exclusive of interest and costs.²

16. This Notice of Removal is timely. It was filed within 30 days of the date GM LLC was served with the Summons and Complaint, as required by 28 U.S.C. § 1446(b). The proper filing fee has also been tendered to the Clerk of this Court.

17. No other defendant has been “joined and served” in this action, so the consent of others is not required under 28 U.S.C. § 1446(b)(2)(A). *See* Ex. C, Clark County District Court, Nevada, Register of Actions, Case No. A-17-750192-C.

18. Venue in this Court is proper under 28 U.S.C. § 1441(a), because the situs of the state court action and crash were both within Clark County, which is within the District of Nevada. *See* also 28 U.S.C. § 1391.

¹ Unlike other actions, punitive damages as against a manufacturer or distributor, like GM LLC, are not limited to trebling or other statutory caps. N.R.S. ¶ 42.005.

² “In ruling on a challenge to subject matter jurisdiction, the district court is ordinarily free to hear evidence regarding jurisdiction and to rule on that issue prior to trial, resolving factual disputes where necessary.” *Wong v. Countrywide Home Loans, Inc.*, No. 2:16-CV-1012 JCM (CWH), 2017 U.S. Dist. LEXIS 3387, at *3-4 (D. Nev. Jan. 9, 2017) (quoting *Augustine v. U.S.*, 704 F.2d 1074, 1077 (9th Cir. 1983)). Thus, the Court should afford GM LLC an opportunity to conduct jurisdictional discovery if the amount in controversy is not satisfied by the nature of these claims as plead on the face of the Complaint.

1 19. Written notice of the filing will be given promptly to all parties who have appeared in
2 this action.

3 20. A Notice to State Court of Removal, with a copy of this Notice of Removal, will be
4 promptly filed with the Clerk of the District Court, Clark County Nevada, and served on the plaintiff's
5 counsel, as required by 28 U.S.C. § 1446(d).

6 21. If any question arises as to whether removal is appropriate in this case, GM LLC
7 respectfully requests the opportunity to present briefing and/or oral argument in support of its position
8 that this case is properly removable.

9 Conclusion

10 For all of these reasons, General Motors LLC gives notice that this action is removed to the
11 United States District Court for the District of Nevada.

12 DATED this 8th day of February, 2017

13 LAW OFFICES OF GREG W. MARSH

14
15 By: 

16 GREG W. MARSH, ESQ.
17 Nevada Bar No. 322
731 South Seventh Street
Las Vegas, Nevada 89101

18 Attorney for General Motors LLC

19 CERTIFICATE OF SERVICE

20 I hereby certify that on the 8th day of February, 2017, I caused GENERAL MOTORS LLC'S
21 NOTICE OF REMOVAL to be electronically transmitted to the Clerk's Office using the CM/ECF
22 System for filing and served VIA MAIL by placing a true copy thereof in a sealed envelope with
23 postage thereon fully prepaid, in the United States Mail to:

24 David J. Martin, Esq.
25 Richard Harris Law Firm
26 810 South Fourth Street
27 Las Vegas, Nevada 89101
Attorneys for Plaintiff

28 Pep Boys-Manny Moe & Jack
c/o Legal Department

1 3111 W. Allegheny Avenue
Philadelphia, Pennsylvania 19132

2
3 Cooper Tire & Rubber Company
c/o Legal Department
4 701 Lima Avenue
Findlay, Ohio 45840

5
6 

Employee of Law Offices of Greg W. Marsh

Exhibit A

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01/27/2017 11:34:18 AM



CLERK OF THE COURT

1 **COMP**
2 DAVID J. MARTIN, ESQ.
3 Nevada Bar No. 9117
4 **RICHARD HARRIS LAW FIRM**
5 801 South Fourth Street
6 Las Vegas, Nevada 89101
7 Phone: (702) 444-4444
8 Fax: (702) 444-4455
9 E-Mail: dmartin@RichardHarrisLaw.com
10 *Attorneys for Plaintiff*

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 MARIE ANTIONETTE GUZMAN, as)
14 Administrator of the Wrongful Death)
15 Estates of RAYMOND GUZMAN and)
16 MARY GUZMAN,)

17 Plaintiff,)

18 vs.)

19 THE PEP BOYS MANNY MOE & JACK,)
20 a Pennsylvania corporation; COOPER TIRE)
21 & RUBBER COMPANY, a Delaware)
22 corporation; GENERAL MOTORS)
23 COMPANY, LLC., a Delaware corporation;)
24 ROE COMPONENT PART)
25 MANUFACTURER; ROE)
26 CORPORATIONS I through X, inclusive,)

27 Defendants.)

CASE NO: A-17-750192-C
DEPT NO. XXXII

28 **PLAINTIFF'S COMPLAINT**

COMES NOW, Plaintiff, MARIE ANTIONETTE GUZMAN, as Administrator of the
Wrongful Death Estates of RAYMOND GUZMAN AND MARY GUZMAN, by and through
her counsel, DAVID J. MARTIN, ESQ. of the RICHARD HARRIS LAW FIRM, and for her
causes of action against Defendants, and each of them, complains and alleges as follows:

JURISDICTION AND PARTIES

1
2 1. At all times relevant, RAYMOND GUZMAN and MARY GUZMAN were citizens
3 of the State of California. On January 12, 2016, the Superior Court of California, County of
4 Los Angeles appointed MARIE ANTIONETTE GUZMAN the administrator of the wrongful
5 death estates of RAYMOND GUZMAN and MARY GUZMAN.

6 2. At all times relevant, Defendant THE PEP BOYS MANNY MOE & JACK ("PEP
7 BOYS") was and remains a foreign corporation organized under the laws of the
8 Commonwealth of Pennsylvania and authorized to conduct business in Clark County, Nevada.

9 3. At all times relevant, Defendant COOPER TIRE & RUBBER COMPANY
10 ("COOPER TIRES") was and remains a foreign corporation organized under the laws of the
11 State of Delaware and authorized to conduct business in Clark County, Nevada.

12 4. At all times relevant, Defendant COOPER TIRE & RUBBER COMPANY
13 ("COOPER TIRES") was and remains a foreign corporation organized under the laws of the
14 State of Delaware and authorized to conduct business in Clark County, Nevada.

15 5. At all times relevant, Defendant GENERAL MOTORS COMPANY, LLC
16 ("GENERAL MOTORS") was and remains a foreign corporation organized under the laws of
17 the State of Delaware and authorized to conduct business in Clark County, Nevada.

18 6. The identity of ROE COMPONENT PART MANUFACTURER is unknown at this
19 time; however, Plaintiff believes ROE COMPONENT PART MANUFACTURER to be the
20 manufacturer of the component parts that are the subject of Plaintiff's complaint. Plaintiff
21 requests leave of the Court to amend this Complaint to name ROE COMPONENT PART
22 MANUFACTURER specifically when its identity becomes known.

23 7. The identity of ROE CORPORATIONS I through X, inclusive is unknown at this
24 time; however, Plaintiff believes ROE CORPORATIONS I through X, inclusive to be the
25 manufacturer of the component parts, installers and other designers that are the subject of
26 Plaintiff's complaint. Plaintiff requests leave of the Court to amend this Complaint to name
27 ROE CORPORATIONS I through X; inclusive ROE specifically when its identity becomes
28 known.

FACTS COMMON TO ALL CAUSES OF ACTION

8. On or about May 17, 2015, Joe Sadot Guzman was operating a 2000 GMC Safari on SR 163 near mile marker 8 in Clark County, Nevada with RAYMOND GUZMAN and MARY GUZMAN as passengers who were restrained by seat-belts.

9. The 2000 GMC Safari was designed and manufactured by Defendant GENERAL MOTORS.

10. The 2000 GMC Safari had each of its tires designed and manufactured by Defendant COOPER TIRES and were purchased from Defendant PEP BOYS.

11. On or about May 17, 2015, at approximately 1:40 pm, while the GMC Safari was travelling on SR 163 near mile marker 8, the left rear tire, designed and manufactured by Defendant COOPER TIRES and sold by Defendant PEP BOYS failed, causing Joe Sadot Guzman to lose control of the vehicle and flipped over onto its roof.

12. The Clark County Coroner declared both RAYMOND GUZMAN and MARY GUZMAN deceased at the scene of the crash.

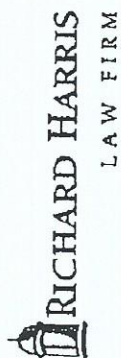
FIRST CLAIM FOR RELIEF
(Strict Product Liability)

13. Plaintiff repeats and re-alleges paragraphs 1 through 12 as though the same were fully set forth at length herein.

14. At the time of the crash, Defendant GENERAL MOTORS had placed the 2000 GMC Safari into the stream of commerce and the vehicle was defective and created an unsafe condition due to the inability of its driver to control the vehicle during a tire malfunction and the propensity for the vehicle to flip over was defective and unreasonably dangerous, without limitation, due to defects in the design and manufacture of the vehicle.

15. At the time of the crash, the 2000 GMC Safari was in substantially the same condition as it was when Defendant GENERAL MOTORS placed it in the stream of commerce and the vehicle had not been altered or modified in any manner.

16. Prior to the time of the subject crash, Defendant PEP BOYS had sold tires that were placed on the 2000 GMC Safari, which were designed and manufactured by Defendant



1 COOPER TIRES and placed into the stream of commerce that were defective and unsafe.

2 17. At the time of the crash, the subject COOPER tires were in substantially the same
3 condition as they were when Defendant COOPER TIRES and Defendant PEP BOYS placed in
4 the stream of commerce and had not been altered in modified in any manner, other than
5 expected wear and tear.

6 18. The failure of the 2000 GMC Safari and the COOPER tires caused the deaths of
7 RAYMOND GUZMAN and MARY GUZMAN and caused damages in an amount in excess of
8 \$15,000.00.

9 19. That Defendants, and each of them, acted with conscious disregard, fraudulently,
10 with express and implied malice and/or oppressively towards Plaintiff and their conduct gives
11 rise to punitive damages as proscribed by statute in an amount in excess of \$15,000.00.

12 20. That it has been necessary for Plaintiff to retain an attorney to prosecute this cause
13 of action and she is entitled to attorney fees and costs.

14 **SECOND CLAIM FOR RELIEF**
15 **(Negligence)**

16 21. Plaintiff repeats and re-alleges paragraphs 1 through 20 as though the same were
17 fully set forth at length herein.

18 22. Defendants, and each of them, had a duty to Plaintiff to exercise reasonable care in
19 its design, testing, manufacturing, sale, examining, maintaining, repairing and/or certification
20 of the 2000 GMC Safari and COOPER tires.

21 23. Defendants, and each of them, failed to exercise the reasonable care in its design,
22 testing, manufacturing, sale, examination, maintenance, repair and/or certification of the 2000
23 GMC Safari and COOPER tires.

24 24. Defendants, and each of them, acts and/or omissions are the proximate and legal
25 cause of the failure of the 2000 GMC Safari and COOPER tires.

26 25. The failure of the 2000 GMC Safari and the COOPER tires caused the deaths of
27 RAYMOND GUZMAN and MARY GUZMAN and caused damages in an amount in excess of
28 \$15,000.00.

1 26. That it has been necessary for Plaintiff to retain an attorney to prosecute this cause
2 of action and she is entitled to attorney fees and costs.

3 **THIRD CLAIM FOR RELIEF**
4 **(Breach of Express Warranty)**

5 27. Plaintiff repeats and re-alleges paragraphs 1 through 26 as though the same were
6 fully set forth at length herein.

7 28. Defendants, and each of them, expressly warranted that the 2000 GMC Safari and
8 COOPER tires were free from defects.

9 29. Defendants, and each of them, breached the express warranties, and these breaches
10 of warranty were the proximate and legal cause of the failure of the 2000 GMC Safari and
11 COOPER tires.

12 30. Defendants, and each of them, acts and/or omissions are the proximate and legal
13 cause of the failure of the 2000 GMC Safari and COOPER tires.

14 31. The failure of the 2000 GMC Safari and the COOPER tires caused the deaths of
15 RAYMOND GUZMAN and MARY GUZMAN and caused damages in an amount in excess of
16 \$15,000.00.

17 32. That Defendants, and each of them, acted with conscious disregard, fraudulently,
18 with express and implied malice and/or oppressively towards Plaintiff and their conduct gives
19 rise to punitive damages as proscribed by statute in an amount in excess of \$15,000.00.

20 33. That it has been necessary for Plaintiff to retain an attorney to prosecute this cause
21 of action and she is entitled to attorney fees and costs.

22 **FOURTH CLAIM FOR RELIEF**
23 **(Breach of Implied Warranty of Merchantability)**

24 34. Plaintiff repeats and re-alleges paragraphs 1 through 33 as though the same were
25 fully set forth at length herein.

26 35. Defendants, and each of them, breached the implied warranty of merchantability,
27 and its breach of warranty was the proximate and legal cause of the failure of the 2000 GMC
28 Safari and COOPER tires

1 with express and implied malice and/or oppressively towards Plaintiff and their conduct gives
2 rise to punitive damages as proscribed by statute in an amount in excess of \$15,000.00.

3 47. That it has been necessary for Plaintiff to retain an attorney to prosecute this cause
4 of action and she is entitled to attorney fees and costs.

5 **SIXTH CLAIM FOR RELIEF**
6 **(Wrongful Death)**

7 48. Plaintiff repeats and re-alleges paragraphs 1 through 47 as though the same were
8 fully set forth herein.

9 49. That the subject crash was due to the negligence, strict liability and other causes of
10 action stated herein by Defendants, and each of them, and caused the deaths of RAYMOND
11 GUZMAN and MARY GUZMAN.

12 50. That as a direct and proximate cause of Defendants' negligence, and each of them,
13 the deceased RAYMOND GUZMAN and MARY GUZMAN suffered disfigurement and
14 extreme pain and suffering in an amount in excess of \$15,000.00.

15 51. That in accordance with Nevada Revised Statutes Chapter 41, Plaintiff and heirs to
16 the Estates of RAYMOND GUZMAN and MARY GUZMAN are entitled to recover special
17 damages in accordance with the Nevada Revised Statutes for RAYMOND GUZMAN and
18 MARY GUZMAN's injuries and for Plaintiff and heir's grief, sorrow, losses of
19 companionship, society and comfort in an amount in excess of \$15,000.00.

20 52. The failure of the 2000 GMC Safari and the COOPER tires caused the deaths of
21 RAYMOND GUZMAN and MARY GUZMAN and caused damages in an amount in excess of
22 \$15,000.00.

23 53. That Defendants, and each of them, acted with conscious disregard, fraudulently,
24 with express and implied malice and/or oppressively towards Plaintiff and their conduct gives
25 rise to punitive damages as proscribed by statute in an amount in excess of \$15,000.00.

26 54. That it has been necessary for Plaintiff to retain an attorney to prosecute this cause
27 of action and she is entitled to attorney fees and costs.

28

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, expressly reserving the right to amend this Complaint prior to or at the time of trial of this action to insert those items of damage not yet fully ascertainable, pray judgment against the Defendant, and each of them, as follows:

1. General damages in an amount in excess of \$15,000.00;
2. Special damages to be determined at the time of trial;
3. For a sum in excess of \$15,000.00 for punitive damages;
4. Medical and incidental expenses already incurred and to be incurred;
5. All statutorily defined damages;
6. Reasonable attorney's fees and costs of suit;
7. Interest at the statutory rate; and,
8. For such other relief as this Court deems just and proper.

DATED this 27th day of January, 2017.

RICHARD HARRIS LAW FIRM

DAVID J. MARTIN, ESQ.
Nevada Bar No. 9117
801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

Exhibit B

ORIGINAL

SUMM

DISTRICT COURT
CLARK COUNTY, NEVADA

MARIE ANTIONETTE GUZMAN, as
Administrator of the Wrongful Death
Estates of RAYMOND GUZMAN and
MARY GUZMAN,

Plaintiff,

vs.

THE PEP BOYS MANNY MOE & JACK,
a Pennsylvania corporation; COOPER TIRE
& RUBBER COMPANY, a Delaware
corporation; GENERAL MOTORS
COMPANY, LLC., a Delaware corporation;
ROE COMPONENT PART
MANUFACTURER; ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO: A-17-750192-C
DEPT NO. XXXII

SUMMONS

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR
BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW**

To THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint.

GENERAL MOTORS COMPANY, LLC

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:

- a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
- b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

///

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///

///

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators, each have 45 days after service of this summons within which to file an answer or other responsive pleading to the complaint.

Issued at the direction of

By: _____

David J. Martin, Esq.
801 South Fourth Street
Las Vegas, NV 89101
Attorneys for Plaintiff

CLERK OF COURT

JOSEFINA SAN JUAN

JAN 30 2017

Deputy Clerk
County Court House
200 Lewis Avenue
Las Vegas, Nevada 89155

Date

NOTE: When service is by publication, add a brief statement of the object of the action. See NRCP 4(b). Revised 03/99/jb



CORPORATION SERVICE COMPANY®

Notice of Service of Process

MD4 / ALL
Transmittal Number: 16194276
Date Processed: 02/03/2017

Primary Contact: Rosemarie Williams
General Motors LLC
Mail Code 48482-038-210
400 Renaissance Center
Detroit, MI 48265

Entity:	General Motors LLC Entity ID Number 3113523
Entity Served:	General Motors Company, LLC
Title of Action:	Guzman, Marie, Antionette vs. The Pep Boys Manny Moe & Jack; Cooper Tire & Rubber Company; General Motors Company LLC
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Clark County District Court, Nevada
Case/Reference No:	A-17-750192-C
Jurisdiction Served:	Nevada
Date Served on CSC:	02/02/2017
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Richard Harrys Law Firm (Las Vegas, NV) 702-444-4444
Client Requested Information:	Year: 2000 Make: GMC Model: Safari (GMC) VIN:

Notes: Richard Harris Law Firm, 801 South Fourth St, Las Vegas, NV 89101
CSC Location document was served: CSC Services of Nevada, Inc. 2215-B Renaissance Drive Las Vegas, NV 89119

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscglobal.com

Exhibit C

Skip to Main Content Logout My Account Search Menu New District Civil/Criminal Search Refine Search Back Location : District Court Civil/Criminal Help

REGISTER OF ACTIONS

CASE No. A-17-750192-C

Marie Guzman, Plaintiff(s) vs. Pep Boys Manny Moe & Jack, Defendant(s)

Case Type: Product Liability

Date Filed: 01/27/2017

Location: Department 32

Cross-Reference Case Number: A750192

PARTY INFORMATION

Defendant	Cooper Tire & Rubber Company	Lead Attorneys
Defendant	General Motors Company LLC	
Defendant	Pep Boys Manny Moe & Jack	
Plaintiff	Guzman, Marie Antionette	David J. Martin Retained 702-476-0100(W)

EVENTS & ORDERS OF THE COURT

01/27/2017	OTHER EVENTS AND HEARINGS
	Complaint
	Plaintiff's Complaint

FINANCIAL INFORMATION

	Plaintiff Guzman, Marie Antionette		
	Total Financial Assessment		270.00
	Total Payments and Credits		270.00
	Balance Due as of 02/08/2017		0.00
01/27/2017	Transaction Assessment		270.00
01/27/2017	Wiznet	Receipt # 2017-08983-CCCLK	Guzman, Marie Antionette (270.00)